

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: :
:
JAY CHRISTIAN DEAN, : Case No: 18-35976
: Chapter 13
Debtor. :
:

REQUESTS FOR ADMISSIONS

The Cassandra Dean, by counsel, pursuant to Federal Rule of Civil Procedure 36, Bankruptcy Rule 7036, and Local Bankruptcy Rule 7026-1, hereby requests that Debtor Jay Christian Dean, admit the following within thirty 30 days from the date of service hereof.

1. Admit that the transcript attached as Exhibit A is a true, correct and genuine word-for-word transcription of the Section 341 Meeting of Creditors in your bankruptcy case, as further evidenced by an mp3 file of a recording maintained by the U.S. Trustee's office, available to you, and provided to your attorney herewith.
2. Admit that the Memorandum of Agreement attached as Exhibit B is a true, correct, and genuine copy of the Memorandum of Agreement dated December 21, 2015 and recorded in Deed Book 11089 at page 0281 among the land records of Chesterfield County, between you and your son concerning your rights in the real property at 2400 Cascade Meadow Drive Midlothian, Virginia, about which you testified at the Section 341 Meeting of Creditors.

CASSANDRA DEAN
By Counsel

Date: January 11, 2019

/s/James H. Wilson, Jr.
James H. Wilson, Jr.
Counsel for Cassandra Dean
VSB No: 27878
4860 Cox Road, Suite 200
Glen Allen, VA 23060
(804) 740-6464

PROOF OF SERVICE

I certify that I have this 11th day of January, 2019, mailed or hand-delivered a true copy of the foregoing Requests for Admissions to the following:

Carl M. Bates, Chapter 13 Trustee
P. O. Box 1819
Richmond, VA 23218

Jacqueline W. Critzer, Esq.
Bowen Ten Cardani, P.C.
3957 Westerre Pkwy., #105
Richmond, VA 23233-1319

Jay Christian Dean
2400 Cascade Meadow Dr.
Midlothian, VA 23112-4292

/s/ James H. Wilson, Jr.
James H. Wilson, Jr., VSB No: 27878
Counsel for Cassandra Dean